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**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA**

SAMSARA INC.,

Plaintiff,

v.

MOTIVE TECHNOLOGIES, INC.,

Defendant

CASE NO. 3:24-CV-06049-JD

MOTIVE TECHNOLOGIES, INC.,

Plaintiff,

v.

SAMSARA, INC.,

Defendant.

CASE NO. 3:24-cv-00902-JD

**DECLARATION OF ELLISEN S.
TURNER PURSUANT TO OCTOBER
31, 2024 ORDER**

Judge: Hon. James Donato

DECLARATION OF ELLISEN S. TURNER
PURSUANT TO OCTOBER 31, 2024
ORDER

CASE NOS. 3:24-cv-00902-JD
3:24-cv-06049-JD

1 I, Ellisen S. Turner, declare as follows:

2 1. I am a Partner with the law firm of Kirkland & Ellis LLP and a member in good standing
3 of the California state bar. I represent Samsara Inc. ("Samsara") in the above-captioned cases.

4 2. I submit this certification pursuant to the Court's October 31, 2024 Order ("Order")
5 requiring a declaration attesting to compliance with the directives therein.
6

7 3. Pursuant to the Order, I certify that I met and conferred with counsel for Motive
8 Technologies, Inc.'s ("Motive") in-person in Washington, D.C., at 2 p.m. Eastern Time on November 6,
9 2024. We met for one hour and discussed exchanging documents to facilitate settlement, a process and
10 schedule for making that exchange in a protected manner, mediator selection, and mediation timing.

11 4. The parties have exchanged lists of specific requests for documents and information sought
12 to advance settlement discussions. The parties' respective counsel are engaged in ongoing discussions
13 concerning the exchange of documents and information responsive to the parties' respective requests, and
14 have identified a selected mediator before whom they intend to schedule a settlement conference for mid-
15 to late-January of 2025.
16

17 * * *

18 I declare under penalty of perjury under the laws of the United States of America that the foregoing
19 is true and correct.

20 Executed in Washington, D.C., on November 13, 2024.

21 DATED: November 13, 2024

22 Respectfully submitted,

23 /s/ Ellisen S. Turner, P.C.

24 Ellisen S. Turner, P.C.
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